

In The United States District Court For The  
Western District of Virginia  
Charlottesville Division

Sines, et al, Plaintiffs vs.  
Kessler, et al, Defendants Civil Case No. 3:17-00072

Sworn Declaration of Christopher Cantwell  
Regarding Conditions At the Grady County Jail

I, Christopher Cantwell, do aver on this 13th day  
of October 2021, that the following is true and  
correct.

- 1) On October 4th USP Marion told me to pack  
all of my property, including all my legal papers. I  
was specifically told to "hurry up".
- 2) Figuring I was being moved for trial, I  
asked about getting my papers back for that purpose,  
and was told I had to talk to Intelligence  
Research Specialist Kathy Hill.
- 3) Ms. Hill was nowhere to be found, so I submitted  
an electronic Staff Request authorizing her to deduct  
the shipping costs from my commissary account, and  
asking all my papers and USB drives be sent to  
wherever I am to be held in Virginia
- 4) I still do not know where I am to be  
held in Virginia or when I'll be taken  
there.

- 5) On October 5<sup>th</sup> I was moved to the Grady County Jail in Oklahoma.
- 6) To my understanding, Grady County is something of a transit hub for federal prisoners with long layovers between flights.
- 7) On Friday, October 8<sup>th</sup>, while I was in the shower, Jail Staff told me to hurry up and get dressed "for Court".
- 8) Without notes, documents, or even a clear picture of what was going on, I found myself looking at Benjamin Daley for what I believe was the first time. It was his deposition.
- 9) Having been caught completely off guard, I asked Mr. Daley no questions. A troubling thing indeed, since I hoped to call him as a witness, and have reason to doubt I'll be able to get him on the stand at trial.
- 10) The notice of Mr. Daley's deposition is not the only paper of mine sitting in a box in Illinois. I am also without the current trial schedule, and the Court's order granting me leave to file electronically, to name just two important and highly time sensitive documents.

- 11) During the Zoom call for Mr. Daley's deposition, Plaintiffs' counsel Michael Bloch mentioned that they would be deposing one Darryl (or Darrell? Spelling Uncertain) Davis, whom I was made to understand was called by Mr. Rebrooks, to replace the witness whose name I do not recall from the Simon Weisenthal Center, whom I have objected to in a separate filing.
- 12) On Tuesday, October 12<sup>th</sup>, Jail Staff summoned me from the Unit for a call with Plaintiffs' counsel regarding confidentiality designations. We mutually agreed to object to each others' designations to preserve our respective rights, but work to resolve the issues privately.
- 13) I put such an objection in the mail that day.
- 14) I was never summoned for the deposition of Mr. Davis.
- 15) I used the Unit's intercom system to ask a staff member. He told me to submit an electronic request. I did. ~~As of October 13<sup>th</sup>~~ it has not been answered. 12:41 pm ~~on~~ October 13<sup>th</sup>, Lt. said "You were not schedule to partake"
- 16) Mr. Bloch informed me the deposition went on without me. Though he tried to get me in.

12) The commissary here does not sell pens, full size pencils, pencil sharpeners or erasers. The only writing instruments available are "Gold Pencils" at \$0.16 each.

13) Getting a pencil sharpened requires a staff members assistance. Charitable words to describe such efforts would include "difficult" and "unreliable". In the week I've been here, I have twice had to wait until the next day to get a pencil sharpened, and have resorted to purchasing 10 pencils a day rather than incur the anger of staff members by pestering them.

14) The difficulties described above are repeated in such staples of correctional facilities such as obtaining toilet paper and, combined with the expectation I'd be leaving any minute have deterred me from requesting more assistance from the staff here.

15) There are no typewriters on the unit, nor copiers.

16) There is a computer terminal on the unit for messaging and commissary, and law library research, but it lacks printing capacity and must be shared with up to 30 inmates on the unit.

17) When I leave here, I will not be able to take any property with me, and will consequently have been stripped of all my papers for the 4<sup>th</sup> time this ~~year~~ year.

18) As trial fast approaches, important deadlines are expiring. I do not know what those deadlines are, or what must be done before they expire.

19) I have not seen a single deposition transcript.

Having so averred, I sayeth no more, under oath.

Respect Fully Submitted,  
Christopher Cantwell  
10-13-2021

C Cantwell

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Barn Swallow

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Western District VA

Charlottesville Division

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